

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

STEVEN B. BARGER,

Plaintiff,

v.

Civil Case No. 1:17-cv-04869-FB-LB

FIRST DATA CORPORATION, *et al.*,

Defendants.

DEFENDANTS' PROPOSED VOIR DIRE

Defendants First Data Corporation, Frank Bisignano, Dan Charron, Anthony Marino, and Rhonda Johnson, by and through their undersigned counsel, respectfully request the Court use the following proposed *voir dire* questions to be submitted to the jury panel.

Defendants reserve the right to supplement and amend these proposed *voir dire* questions and to submit additional proposed questions based on the Court's rulings before or at trial, the Court's ruling on Defendants' Motion for Administration of a Supplemental Juror Questionnaire, or otherwise, as appropriate.

1. What is your place of residence, whether you rent or own, and how long have you lived there?
2. What is your occupation?
3. Who is your employer?
4. If you are retired or currently unemployed, please state your former occupation and the name of your last employer.
5. Are you married or living with someone? If so, what is that person's occupation?
6. Do you have any children?

7. If you have children, what is each child's occupation?
8. If you have children, what schools do/did they attend?
9. What schooling have you had?
10. What newspapers, magazines, and books do you like to read?
11. What television programs do you like to watch?
12. What hobbies do you have?
13. Have you ever been a juror before? If so, was it a civil or criminal case? Without stating what it was, did the case go to verdict?
14. Have you or any relative or close friend ever been involved in a civil case as a party?
15. Is there any reason why you could not listen to the evidence, follow the Court's instructions as to the law, and render a fair and impartial verdict?
16. Do you know any attorney employed by or associated with the firm Saul Ewing Arnstein & Lehr?
17. Do you know any attorney employed by or associated with the firm Bond, Schoeneck & King?
18. Do you know any attorney employed by or associated with the firm the Law Office of Shawn Shearer, PC?
19. Do you know any attorney employed by or associated with the firm Zeitlin & Zeitlin, P.C.?
20. Have you or anyone you know ever been represented by any of those firms?
21. Do you know Steven Barger?
22. Do you know Frank Bisignano?

23. Do you know Dan Charron?
24. Do you know Anthony Marino?
25. Do you know Rhonda Johnson?
26. Have you heard of the company First Data Corporation?
27. Have you heard of the company Fiserv?
28. Have you ever worked for First Data Corporation?
29. Have you ever worked for Fiserv?
30. Have you ever taken leave from work due to your own serious medical condition?
31. Have you ever been terminated from employment?
32. Have you ever been included in a reduction-in-force?

If you are uncomfortable answering any questions, you may ask to speak with me and the attorneys privately.

SAUL EWING ARNSTEIN & LEHR LLP

/s/ Gary B. Eidelman

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Dated: August 30, 2019